

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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UNITED STATES OF AMERICA :

V. : CRIMINAL NO: 2:24-cr-00263-MAK

DONALD MICHAEL :

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**ORDER**

**AND NOW**, this                    day of                   , 2024, it is hereby ORDERED that

Defendant's Unopposed Motion To Extend Deadlines For Time To File Pretrial Motions  
in the above captioned matter is hereby GRANTED.

BY THE COURT:

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J.

**R. EMMETT MADDEN, ESQUIRE**  
THE PHILLY LAWYERS  
Attorney I.D. No. 86894  
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**DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEADLINES FOR  
TIME TO FILE PRETRIAL MOTIONS**

TO THE HONORABLE JUDGE MARK A. KEARNEY:

AND NOW, Defendant, Donald Michael, by and through his attorney, R. Emmett Madden, Esquire, hereby submits this unopposed motion to extend deadlines for time to file pretrial motions and avers the following:

1. On July 18, 2024, the government sealed a 4-count Indictment charging Defendant Donald Michael with Conspiracy to Manufacture Child Pornography and other related charges.
2. Mr. Michael is charged in that Indictment with the following: Count One Conspiracy to Manufacture Child Pornography, Conspiracy to Receive and Distribute Child Pornography, Receipt of Child Pornography and Distribution and Attempted Distribution of Child Pornography.

3. On August 27, 2024, R. Emmett Madden, Esquire entered his appearance to represent Mr. Michael.

4. Pretrial Motions are due January 3, 2025.

5. Trial is scheduled for Tuesday, February 18, 2024, at 9:00 A.M., in Courtroom 6B, United States Courthouse, 601 Market Street, in Philadelphia Pennsylvania.

6. This is an extremely serious matter where defendant faces a lengthy period of imprisonment.

7. Counsel is requesting to extend deadlines for an additional 60 days from the January 3, 2025 motions date to file pretrial motions.

8. Counsel is requesting to continue Trial for an additional 30 days.

9. Defendant acknowledges and waives his speeding trial rights.

10. Assistant United States Attorney Kelly Harrell is unopposed to the extension request.

WHEREFORE, Defendant respectfully requests the Unopposed Motion to Extend Deadlines for Time to File Pretrial Motions be Granted.

Date: 1/2/2025

Respectfully submitted by:

/S/ R. EMMETT MADDEN, ESQUIRE  
R. EMMETT MADDEN, ESQUIRE  
*Attorney for Defendant*

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**CERTIFICATE OF SERVICE**

I, R. Emmett Madden, Esquire, hereby certify that, on this date, I have served a copy of the attached Defendant's Motion Unopposed Motion To Extend Deadlines For Time To File Pretrial Motions upon the following by electronic mail:

The Honorable Mark A. Kearney  
United States District Court  
Eastern District Court of Pennsylvania  
6613 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106  
*Via Email*

AUSA Michelle Rotella  
AUSA Kelly Harrell  
United States Attorney's Office  
615 Chestnut Street  
Suite 1250  
Philadelphia, PA 19106  
*Via Email*

Date: 1/2/2025

Respectfully submitted by:

**/S/ R. EMMETT MADDEN, ESQUIRE**  
**R. EMMETT MADDEN, ESQUIRE**  
THE PHILLY LAWYERS  
Attorney I.D. No. 86894  
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Attorney for Defendant